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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**DISABILITY RIGHTS OREGON,  
METROPOLITAN PUBLIC DEFENDER  
SERVICES, INC., & A.J. MADISON,**  
Plaintiffs,

v.

**SAJEL HATHI**, in her official capacity as head  
of the Oregon Health Authority, & **SARA  
WALKER**, in her official capacity as  
Superintendent of the Oregon State Hospital,  
Defendants.

**JAROD BOWMAN** and **JOSHAWN  
DOUGLAS-SIMPSON**,  
Plaintiffs,

v.

**SARA WALKER**, Interim Superintendent of the  
Oregon State Hospital, in her official capacity,  
**SAJEL HATHI**, Director of the Oregon Health  
Authority, in her official capacity,  
Defendants.

Case No. 3:02-cv-00339-AN (Lead Case)

Case No. 3:21-cv-01637-AN (Member Case)

PLAINTIFF DISABILITY RIGHTS  
OREGON'S NOTICE OF SUPPLEMENTAL  
AUTHORITY

### NOTICE OF SUPPLEMENTAL AUTHORITY

Plaintiff Disability Rights Oregon wishes to bring to the Court's attention a recent Ninth Circuit opinion from March 19, 2025, in the case [Coleman v. Newsom](#), Case No. 24-4023. Because the case opinion was issued yesterday, the opinion is not yet published, but is available via Westlaw. [Coleman v. Newsom](#), No. 24-4023, 2025 WL 851077 (9th Cir. Mar. 19, 2025). Plaintiffs understand this opinion to uphold in part and reverse in part the Eastern District of California's opinion in the same matter, which is published as [Coleman v. Newsom, No. 2:90-CV-0520 KJM DB P](#), 2024 WL 3385911, at \*1 (E.D. Cal. July 12, 2024). The Ninth Circuit's discussion of the criteria for contempt proceedings (at \*\*4-7), the impossibility defense (\*\*7-8), the due process requirements (\*\*9-11), and the calculation of contempt fines (\*11) may be of assistance to this Court.

DATED this 20th day of March 2025.

DISABILITY RIGHTS OREGON

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